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AQUATIC RESOURCES NEWS A REGULATORY NEWSLETTER

Headquarters, U.S. Army Corps of Engineers,
Regulatory Branch

A Note from Headquarters

Headquarters Regulatory Branch welcomes readers to the first issue of *Aquatic Resources News* and is pleased to see this Corps regulatory newsletter begin after a very long hiatus. We encourage field staff to read the newsletter to see what is happening in the rest of the country and to see how other regulators are dealing with complicated issues. We intend for this newsletter to assist regulators in the field and help them do their job better.

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Regulatory Program Developments

The intent of this newsletter is to share information on district experiences with other Corps districts. The newsletter will be prepared for Headquarters Regulatory Branch (HQ) by the Institute for Water Resources (IWR) and issued quarterly.

This first issue focuses upon recent Corps experiences with *Scope of Analysis* including a court decision.

Newsletters will contain a note from HQ and information on current events of interest. The newsletter will also list journal articles, reports, or notes that

may be of interest to district regulators. IWR and HQ encourage field regulators to write to the editor on their perspectives on the articles. Future newsletters may include submitted comments.

Topics in upcoming issues will include: compensatory mitigation; the watershed approach and cumulative impact assessment; and endangered species.

The Editor

Scope of Analysis: Recent Approaches

Deciding on the appropriate scope of analysis for a regulatory action can sometimes be very perplexing. NEPA scope of analysis for the regulatory program is addressed in paragraph 7 of Appendix B of 33 CFR Part 325. This regulation limits NEPA scope of analysis to the specific activity requiring a Corps permit and any additional portions of the project over which there is sufficient Federal control and responsibility.

When determining the amount of Federal control and responsibility, district engineers should consider whether other Federal agencies are required to take action, as a result of laws such as the Fish and Wildlife Coordination Act, the National Historic Preservation Act, the Endangered Species Act, and the Magnuson-Stevens Fishery Conservation and Management Act. Guidance documents, such as RGL 88-13, and judicial rulings should also be

Distribution of Aquatic Resources News

The *Aquatic Resources News* will be distributed to field staff by email. The Newsletter will also be available on the IWR website within the month at:

<http://www.iwr.usace.army.mil/iwr/Regulatory/regulintro.htm>

Or you may contact the Editor, Bob Brumbaugh, CEIWR-PD (703) 428-7069

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considered when determining scope of analysis for the purposes of NEPA.

In this issue we take a close look at the reasoning behind three recent scope of analysis cases. The Playa Vista case deals primarily with upland development where some wetlands would be impacted by the proposed permit action. Los Angeles District's scope of analysis led them to believe that they should only evaluate direct impacts to the wetlands at Playa Vista. The basis for this decision was that the applicant could, and would if he had to, develop most of his land without a Corps permit. Furthermore the District used the mitigation plan, which was an integral part of the overall proposal, to make the determination of "no significant impact" under NEPA.

In the Robinson Island case, Mobile District also concluded that they should only evaluate direct impacts to wetlands and waters because the permit application was for a residential development that was primarily in the uplands. HQ and ASA (CW) disagreed with this scope of analysis because, unlike Playa Vista, no development of the sort envisioned by the applicant could occur on Robinson Island without a Corps permit. In essence a Corps permit would not be merely a link in a larger proposal but would extend some degree of Federal responsibility over the entire project.

The third case involves a Federal project, Highway 1, which if widened in just the upper reaches could have significant adverse secondary and cumulative impacts over the entire Florida Keys. Not only does the "but for" concept discussed in Robinson Island apply here also, but the extension of Federal interest is further substantiated by the Federal project. The resulting very broad scope of analysis requires a NEPA document that must address issues that are currently at the leading edge of our understanding. Fortunately a new tool is being developed as part of the Florida Keys Carrying Capacity Study, which may be able to help in such decisions.

Scope of Analysis: Playa Vista Decision —Upland Inclusion?

In an important test of the Corps Regulatory program scope of analysis policies under NEPA, the 9th Circuit Court of Appeals struck down the ruling of the District Court in favor of the Corps position (filed August 21, 2000). In this case the appropriate scope of analysis, formulated by the Corps, only looked at the impacts on wetlands and focused on just the first phase of a multi-phase project. In addition to specific scope of analysis considerations, this case also involved other significant NEPA issues including whether an EIS, rather than an EA, was required when there were technical uncertainties about the potential success of mitigation and public controversy. The Circuit Court also addressed whether a mitigation plan that is part of a proposed project can be used in determining "significance" of the overall project impacts, from a NEPA perspective.

Playa Vista consists of over 1,000 acres of undeveloped land along coastal Los Angeles County and contains approximately 186 acres of wetlands. These wetlands are generally part of a freshwater-saltwater coastal wetland complex known as the Ballona Wetlands. Even though degraded due to oil extraction, channelization of adjacent creeks, reduction of tidal influence, past agricultural uses and rampant urbanization on adjacent lands, these wetlands continue to provide significant natural resource functions. Regionally their value is even greater due to the scarcity of large, coastal wetland complexes in southern California.

Because of the landowner's intent to develop the property and desires by various interests to preserve all of Playa Vista for environmental purposes, any permit action here would be expected to be controversial. Since 1979 the applicant and the predecessors have been planning to build on this land. The current proposal, after having gone through several iterations, is for a mixed-use, commercial-residential development

that not only minimizes adverse impacts to wetlands, but also has wetland enhancement features.

Prior to applying for a permit the applicant met with the Corps to determine how the multi-phase project should be approached for permitting purposes. The project was divided into three separate phases requiring three separate permits. Phase 1 would involve a permit action affecting about 8 acres of scattered wetlands associated with development of 600 acres of uplands. Up-front mitigation for the 21 acres of wetland, projected to be lost from all three project phases, is also part of Phase 1. This compensatory mitigation would be accomplished through construction of a 51-acre freshwater wetland complex. This mitigation also includes compensation for an additional 8 acres of wetlands which would be impacted during the actual mitigation construction, making the total wetland loss during Phase 1 about 16 acres.

Phase 2 consists of restoration and creation of 230 acres of saltwater wetlands within and adjacent to 160 acres of existing wetlands. No urban or commercial development was planned during this phase.

Phase 3 involved the development of a marina and ecological enhancement of the Ballona flood control channel. This phase would impact a total of 9.8 acres of wetlands within 3.7 acres of a man-made drainage ditch and 8.1 acres of scattered, degraded wetlands located on an old dredged material disposal site.

CORPS SCOPE OF ANALYSIS

The Corps concluded that the three phases of the project had independent utility and therefore could be evaluated separately under NEPA. Prior to making the independent utility determination, the Corps documented EPA's concurrence on this issue. The scope of analysis also concluded that since the landowner could complete most of the Phase 1 without a Corps permit, there was no basis to expand the impact analysis beyond the regulated wetlands. Furthermore, based on the degraded quality of the scattered, isolated

wetlands in Phase 1 and the comprehensive mitigation plan, there would be a net benefit to the wetland resources. Accordingly the District proceeded with an EA and FONSI rather than an EIS for Phase 1. However, the EA, while focusing on Phase 1, also addressed the potential impacts of the other two project phases as cumulative impacts.

Initially the Federal and state resources agencies objected to the three-phase approach because of concerns regarding the adequacy of overall mitigation. These objections were overcome after the applicant provided documents addressing the agencies' concerns, and the Corps developed a special condition that would be added to the Phase 1 permit.

Significantly, review of these documents by the Corps also re-affirmed their initial scope of analysis determination that the three phases of the project had independent utility and therefore could be evaluated separately.

9TH CIRCUIT COURT OF APPEALS RULING

Deliberations and rationale for the Circuit Court's decision supporting the Corps position are documented in a 36-page Decision Document available at <http://laws.lp.findlaw.com/9th/9856242.html>

The following are brief extracts from the Decision Document:

Extent of Federal Interest. With only 16 acres of isolated wetlands, there was not sufficient control and responsibility over the remaining 600 acres of upland to expand the Corps scope of analysis to the entire Phase 1 development. The Circuit Court concluded that the environmental consequences of the larger project were not the products of the Corps permit action.

Segmentation. The Circuit Court applied an "independent utility" test to determine whether an agency is required to consider multiple actions in a single review pursuant to CEQ regulations. In applying this test, the panel concurred

with the Corps position that the permit action for the Phase 1 development, and subsequent two phases, all had independent utility.

Uncertainty of Successful Mitigation.

The District Court had agreed with the plaintiffs that, due to uncertainty whether the mitigation would be successful: an EIS should have been prepared. The Circuit Court found that the Corps had considered numerous reports, studies, and comments, which evaluated the feasibility of the freshwater wetlands mitigation contrary to the assertions of the District Court. Furthermore, the Circuit Court found the District Court's assertion about uncertainty of successful mitigation was based on mischaracterization of the evidence in the administrative record.

Use of Mitigation in EA / EIS Decision.

The Circuit Court found that the plaintiffs had exaggerated the deficiencies of the mitigation evidence found in the record. The Circuit Court acknowledged that an agency's decision to forego preparation of an EIS may be justified by the presence of mitigation measures. Furthermore the Court found that the record supported the EA's evaluation that "... the filling of the wetlands in Phase 1 would not significantly affect the environment and that any negative impacts would be mitigated by the creation of the 51-acre freshwater system."

Public Controversy. Plaintiffs had argued that controversy surrounding the decision to authorize the project in the freshwater wetland system required the Corps to prepare an EIS. The Circuit Court pointed out that the existence of controversy to a use does not render an action controversial for the purposes of NEPA.

In addition to the Circuit Court's decision, another event substantiated the Corps scope of analysis determination. From the beginning of their scope of analysis determination, it was a Corps underlying belief that the landowner could and would proceed with development on the upland portions of the 600-acre Phase 1 project area, even without a Corps permit. This belief was

confirmed when the landowner successfully proceeded with development in the uplands while the District Court's injunction prohibiting construction within the delineated wetlands was in effect.

The plaintiffs appealed the Circuit Court's decision to the Supreme Court. The Supreme Court denied certiorari on October 1, 2001. For more information, see: <http://www.supremecourtus.gov/docket/00-1692.htm>. For more details on these decisions, contact David Castanon at (805) 585-2141

Rudy Nyc

Scope of Analysis: Robinson Island Decision—a Case from Mobile

As a result of a Section 404(q) elevation case, the Mobile District was directed to look at the cumulative and secondary impacts from an upland development on aquatic and wetland resources as part of their evaluation of two related permit actions. The guidance from HQ, with concurrence from the Assistant Secretary of the Army (Civil Works) (ASA(CW)), was sent October 20, 2000 and deals with permits associated with residential development at Robinson Island, Baldwin County, Alabama.

Robinson Island is an undeveloped, privately owned 14-acre island located about 1,700 feet from the mainland. The landowner applied for a Corps permit, the first for work needed to support a proposed 34 home residential subdivision that would only be accessible by boat. The permit application was for construction of 34 piers, one for each of the proposed homes, a community pier that would accommodate 19 recreational boats and a supply boat, limited dredging to facilitate navigation, placement of riprap below the mean low water line for erosion control and construction of wooden walkways that would not

involve any placement of fill in wetlands. An interior road would bridge a wetland so as to avoid placement of fill. The material dredged to facilitate navigation would be used for construction purposes on the island. All 7 acres of wetlands in the center of the island would be protected by a deed restriction. The District's stated project purpose was "To provide community docking, individual piers, and shoreline protection, allowing future residents access to a proposed subdivision on a privately owned island to be accessible only by boat."

The second permit application was from an electric utility which requested authorization to install four, 5-inch utility conduits from the mainland to the island. Installation would be by water jet or jet plow, to a depth of 4 to 6 feet below the sandy bottom. The project purpose, according to the District is "to provide conduits for electricity and other utilities to Robinson Island as part of a proposed development of the island as a residential subdivision."

The District processed both permit applications concurrently intending to issue them concurrently. The District made sure interested parties were aware of the relationship between the two proposed projects by having the two public notices refer to each other. Although the U.S. Fish & Wildlife Service (FWS) attempted to elevate the marina development permit decision under Section 404 (q), they failed to meet the MOA deadlines and the permit was issued. The FWS requested elevation of the utility line permit under Section 404 (q). The FWS contended that the two permit applications were interrelated and should have been processed that way. Furthermore, the FWS stated that a colonial bird rookery within the wetlands in the center of the island, and submerged aquatic vegetation around the island, were Aquatic Resources of National Importance (ARNI). Impacts to these ARNI resources from both permit actions had not been adequately evaluated according to the FWS.

HQ, after reviewing pertinent information, concurred with the FWS

position that the scope of analysis should be extended. HQ arrived at this decision after they had applied a "but for" test which revealed that no residential development could occur on Robinson Island without a Corps permit. The Corps NEPA regulations address the scope of analysis as it pertains to those portions of the project over which the District Engineer has sufficient control and responsibility to warrant Federal review. This includes "activities beyond limits of Corps jurisdiction when there is sufficient Federal involvement to turn private action into Federal action." In this case a Corps permit would be needed for docking facilities to get construction equipment and materials, as well as future residents, to the island. The utility crossing, which would provide needed energy and water to the island required a Corps permit. This means that the Corps must evaluate impacts to wetlands and waters from all activities that occur due to the issuance of the permit, including the upland development. From a NEPA perspective this meant that impacts to wetlands and aquatic resources from reasonable alternatives in the uplands were also to be evaluated.

HQ's review of the record revealed that the District did a good job of addressing potential direct impacts of the project within the Corps geographic jurisdiction. They noted the district appropriately coordinated all pertinent comments with the applicants, applied its professional judgment on the potential and degree of impact, and facilitated project revisions. The District coordinated comments and responses between the applicant and the FWS. The District even negotiated project revisions, including elimination of development in the "bird-rookery" center of the island, even though no wetland fill had been proposed there to provide a clear case of jurisdiction. Indirect effects of the overall development were not, however, fully addressed. Because the District was operating under a more restrictive scope of analysis by looking only at aquatic resource impacts, the District did not fully evaluate the effects of upland construction. They also did not pursue related FWS recommendations because they believed these were beyond their

jurisdictional purview and that there was not sufficient Federal involvement to turn private action into Federal action.

The District has suspended the marina development permit and requested specific information from the applicant that should help ascertain secondary impacts from the residential development. Appropriate alternative analysis and NEPA review will be performed. The development and utility line permit applications will be handled as one action for the purposes of NEPA and to avoid the perception of piecemealing. However, the permit applications will remain as two separate permit actions since the utility cooperative is a legal entity separate from the developer and the cooperative does not want to be bound by a permit issued to the private sector. The District's new scope of analysis includes the entire island and adjacent waters. The revised project purpose statement is "To develop a viable water oriented residential subdivision in the coastal Baldwin County area."

For more details on this decision, contact Chuck Sumner at (334) 694-3792

Rudy Nyc

Editor's note: Since this article was prepared, the district complied with HQ guidance, completed the analysis and reissued the permits with modifications to protect the heron rookery. However, the developer is appealing those conditions, and the FWS is considering requesting the Division Commander to suspend the permit again. These subsequent events do not change the importance of the HQ directive regarding scope of analysis.

Scope of Analysis: Florida Keys Carrying Capacity Study

When the Jacksonville District Regulatory Division received a permit application from the Federal Highway Administration (FHWA) and the Florida

Department of Transportation (FDOT) to widen a portion of U.S. Highway 1, they knew that this was a project that would involve a very broad scope of analysis. They also knew that it would be very difficult to fully evaluate all the impacts. Now a new tool, being developed as part of the Florida Keys Carrying Capacity Study (FKCCS) conducted by the Jacksonville District's Planning Division in partnership with the State of Florida, can help in the analysis of the types of impacts that could result from a project such as the U.S. Highway 1 expansion.

The Florida Keys are connected to each other and the mainland by just one road, US Highway 1. Most of the road has two lanes. Monroe County, within which all of the Keys are located, has a rate of growth ordinance that attempts to limit development so that all of the Keys can be evacuated within 24 hours. The resident and tourist populations in the Keys have been steadily increasing. When the District received the permit application for the proposed highway expansion, the estimated time for evacuating the Keys was about 22 hours. Widening the upper eighteen miles of U.S. Highway 1 from two to four lanes could reduce evacuation time to about 17 hours. This would provide a substantial safety margin for evacuation in the event of an emergency. However, improving evacuation rates would also improve access to the Keys and allow Monroe County to grant more building permits under its rate of growth ordinance.

Though the plan submitted by the FDOT contained good mitigation features for direct impacts to aquatic resources, such as numerous culverts under existing roads to facilitate water circulation and wetland restoration, the increased development and its attendant impacts troubled Jacksonville District the most. The Jacksonville District Regulatory Division concluded that the scope of analysis went beyond the footprint of this proposed project. John Hall, Chief of the Regulatory Division, Jacksonville District, said, "It was the cumulative impacts of accelerated wetlands fill from development, coupled to the secondary impacts on receiving waters from road runoff and all the additional toilets being flushed into unmaintained septic systems

which were of concern. Impacts on reef tracts from deteriorating water quality, increased vehicular traffic impacts to the Key deer, and, in general, the deterioration of the only National Marine Sanctuary with coral reefs in the continental U.S. which most concerned us." Jacksonville District's broad scope of analysis was fully supported by Corps HQ and the Assistant Secretary of the Army (Civil Works).

The EIS prepared by the FDOT did not adequately address all the impacts that the District needed to evaluate in this permit application. Furthermore, the applicant indicated they did not have the tools with which to evaluate all the impacts that could occur under the broad scope of analysis advocated by the District. It was during this period that the Regulatory Division became aware of discussions about a carrying capacity study being proposed for the Keys and realized that such a tool could be very useful in processing permits of the scope of the U.S. Highway 1 expansion project. Regulatory informally supported the development of the FKCCS. Deliberations over the U.S. Highway 1 permit application may have contributed to the formulation of the FKCCS.

The purpose of the FKCCS is to develop a knowledge-based tool that will allow resource managers and planners to make determinations about the ability of the Keys ecosystem to withstand land development and associated population growth. This effort is about sustainability: sustainability of the culture, sustainability of the economy and sustainability of the ecosystem. It addresses such concerns as how much human density and activity can the Keys ecosystem sustain before there is irreversible or otherwise unacceptable loss to the resource. These concerns about this ecosystem go back to at least 1975 when Florida identified the Keys as an Area of Critical State Concern. However, even this recognition by the state did not deter continued development from stressing the unique and fragile ecosystem of the Keys. The FKCCS is developing the tools that should be able to help preserve the

ecosystem and sustain the quality of human life in the Keys.

Because of the complexity of biological interactions within the various habitats that comprise the Keys ecosystems, a computer-based model is being developed to facilitate analysis. This model, the Carrying Capacity Analysis Model (CCAM), is being built with the active involvement of local planners and the public. The complexity of the biological requirements within the Keys can be illustrated with a species of butterfly, the Schaus' swallowtail that occurs there. This butterfly requires a specific species of a tree for its larval stage and a different species of tree, located in a different habitat type, for its butterfly stage. These different habitats must be close enough for the butterfly to reach them. Also, the specific tree required by the butterfly will not be used if it is located outside of the required habitat. Therefore, two distinct, functional, habitat types plus the proximity of these habitats must be considered for the survival of this species. This butterfly also supports other higher trophic levels species while performing functions, such as pollination, to support the habitats in which it occurs. While the CCAM will not do anything that biologists are not already doing, it will provide automated tools for the local planners to utilize when making permit decisions. In addition, the CCAM will be designed to be run about every 2 to 5 years when local decision-makers are considering land use and policy changes within their Comprehensive Plans. The overall study will also have geographic information system (GIS) capability so that the various land use scenarios can be displayed as map products.

Before the FKCCS was even underway, the District informed the FDOT that, without more information that fully addressed the broad scope of analysis, they would have to deny the permit. The FDOT withdrew their permit application and has not reapplied for a similar project in the Keys. Initially, the FKCCS appeared to be a useful tool that would not be completed in time to be used for the U.S. Highway 1 permit decision. Now, however, the study and the CCAM

should be ready if the FDOT and FHWA apply for another permit to expand portions of U.S. Highway 1.

The FKCCS was authorized in the Water Resources Development Act of 1996 as an independent Critical Project, associated with the Central and Southern Florida ecosystem restoration effort. The FKCCS started in 1999 and, according to Deborah Peterson (Jacksonville District Planning Division), it is on track for completion in June 2002.

A report on a test of the model is being reviewed now by the study team. The National Academy of Sciences (NAS) is conducting an independent review. Two scenarios were modeled to test the model: current conditions and the "smart growth" scenario. The scenarios are defined from a menu that specifies the "end state" geographically. Local planners helped develop the "smart growth" scenario. This scenario was defined with dozens of choices from the scenario design screens. The model then calculated a variety of demographic and environmental attributes of the Keys under these conditions. The purpose of the test was to show how the model worked and determine if it returned reasonable results.

For more details on this study, contact Deborah Peterson at (904) 232-2204 or John Hall at (904) 232-1666.

Rudy Nyc and Bill Werick

Editors' note: Since this article was prepared, the NAS completed their review of the preliminary model. The NAS confirmed that the CCAM could be a useful tool to help develop land and water policies for the Keys. However, it pointed out specific areas where underlying data and science, even if the best available, are incomplete or unproved. The next steps for the FKCCS are public meetings, addressing the NAS findings in finalizing the CCAM, and evaluating several future development scenarios with the final CCAM. The NAS review is available at: <http://www.nap.edu/books/030908346X/html>

Current Events and Articles of Interest

This section is intended to include items of interest such as upcoming conferences and recent journal articles, studies, and Federal Register notices.

New Advisory Council on Historic Preservation regulations. The Corps is initiating coordination to address use of the new Advisory Council on Historic Preservation (ACHP) regulations at 36 CFR 800 in the Corps Regulatory Program. On March 8, 2002, the Corps published a notice in the Federal Register to solicit views on the new regulations and to identify any changes that need to be made in the permit program to comply with the requirements of the National Historic Preservation Act. Each district issued a public notice announcing the publication of the Federal Register notice. The Corps expects to issue interim guidance to all districts and divisions. However, this guidance may change after this process is completed. The Federal Register notice is available at: <http://www.usace.army.mil/inet/function/cw/cecwo/reg/frnotice.pdf>

IWR is assisting HQ in this effort. All comments must be received by IWR by May 5.

In-lieu fee arrangements. Interest and concern about in-lieu fee (ILF) compensation continues. Many of you know of the U.S. General Accounting Office Report GAO-01-325 *Wetlands Protection: Assessments Needed to Determine Effectiveness of In-Lieu Fee Mitigation* published in May 2001. IWR also prepared a report on ILFs that may interest those thinking about this option for their district. The IWR report prepared in late 2000 is entitled *Review and Analysis of In Lieu Fee Mitigation in the CWA Section 404 Permit Program*. The report was prepared to help inform preparation of the in-lieu fee guidance that was issued in November 2000.

The IWR report examines seven ILF arrangements and is based on interviews of Corps staff and ILF administrators. The report is available on the IWR website: <http://www.iwr.usace.army.mil/iwr/Regulatory/regulintro.htm>

Changes at HQ. HQ bids *adieu* to John Studt and Sam Collinson. This newsletter is the result of John and Sam's interest in better communication and information transfer among the Corps districts. HQ welcomes Jennifer Moyer from the Baltimore District.

Newsletter Communication

To comment on the newsletter, suggest topics, submit an article, or suggest events or articles of interest, please contact Bob Brumbaugh at:

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